

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEIGHTON TECHNOLOGIES LLC, :

Plaintiff, :

- against - :

04 CV 2496 (CM)(LMS)

OBERTHUR CARD SYSTEMS, S.A. :

Electronically filed

Defendant. :

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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF LEIGHTON
TECHNOLOGIES LLC MOTION TO ADMIT
ROBERT A. GUTKIN PRO HAC VICE**

THE FACTS

The Court is respectfully referred the affidavit of Patrick L. Parker in support of the attached Motion.

Point I

**THE APPLICANT HAS MET THE REQUIREMENTS OF THE LOCAL CIVIL
RULES OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK AND THEREFORE THE MOTION SHOULD BE GRANTED**

Local Civil Rule 1.3, ADMISSION TO THE BAR; (c) provides:

A member in good standing of the bar of any state or of any United States District Court may be permitted to argue or try a particular case in whole or in part as counsel or advocate, upon motion and upon filing with the Clerk of the District Court a certificate of the court for each of the states in which the applicant is a member of the bar, which has been issued within thirty (30) days and states that the applicant is a member in good standing of the bar of that state court. Only an attorney who has been so admitted or who is a member of the bar of this court may enter appearances for parties, sign stipulations or receive payments upon judgments, decrees or orders.

Conclusion

The motion for admission pro hac vice should be granted.

Dated: New York, New York
December 15, 2004

s
Patrick L. Parker (PP-5892)
CLIFFORD CHANCE US LLP
31 West 52nd Street
New York, New York 10019
(212) 878-8000

*Attorney for Plaintiff Leighton
Technologies LLC*

TO: James David Jacobs
Baker & McKenzie
805 Third Avenue
New York, New York 10022

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Motion For Admission Of Robert A. Gutkin pro hac vice, the Motion, the Affidavit of Patrick L. Parker (and attachment thereto) in support thereof, the Memorandum of Law in support thereof, and the Proposed Order Granting Admission pro hac vice was this 15th day of December 2004 served via United States mail on the following counsel of record:

James David Jacobs
Baker & McKenzie
805 Third Avenue
New York, New York 10022

Counsel for Defendant Oberthur Card Systems, S.A.

S
Patrick L. Parker (PP-5892)